

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**REENA S. MATHEW,**

**Plaintiff,**

**v.**

**SANTANDER CONSUMER USA INC.,**

**Defendant.**

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**CIVIL ACTION NO. 3:23-CV-01494-N**

**DEFENDANT’S REQUESTED VOIR DIRE QUESTIONS**

**TO THE CHIEF UNITED STATES DISTRICT JUDGE DAVID C. GODBEY:**

Pursuant to the Court’s Order Resetting Trial [Doc. No. 31], Defendant Santander Consumer USA Inc. (“Santander”) submits the following Requested Voir Dire Questions, and request that, in addition to the Court’s customary instructions and voir dire questions to potential jurors, Santander be permitted to pose the following questions to potential jurors in this case:

1. Has anyone ever worked for a bank?
  - a. What are the details of your employment?
  - b. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
2. Has anyone ever been a plaintiff or defendant in a lawsuit?
  - a. Were you plaintiff or defendant?
  - b. What was the nature of the lawsuit?
  - c. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
3. Has anyone ever testified as a witness in a lawsuit?
  - a. What was the nature of your testimony?

- b. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
- 4. Has anyone ever worked for a large company?
  - a. What company?
  - b. What was your position?
  - c. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
- 5. Has anyone ever been laid off?
  - a. Tell us about that experience.
  - b. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
- 6. Have you ever lost your job, even though you feel like you shouldn't have?
  - a. Tell us about that experience.
  - b. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
- 7. Has anyone here ever filed a grievance or a charge against a current or former employer?
  - a. What type of complaint?
  - b. What was the outcome?
  - c. Is there anything about that experience that you feel might prevent you from being a fair and impartial juror to both the Ms. Mathew and the Santander?
- 8. Has anyone experienced discrimination on the basis of their age or national origin?
  - a. Please briefly summarize the nature of the discrimination.

- b. Is there anything about this experience that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
- 9. Does anyone have a family member or close friend who claimed they experienced discrimination from an employer?
  - a. What type of complaint?
  - b. Was it related to discrimination?
  - c. What was the outcome?
  - d. Is there anything about that experience that you feel might prevent you from being a fair and impartial juror to both the Ms. Mathew and the Santander?
- 10. Have you ever worked in human resources?
  - a. Where did you work in human resources?
  - b. In that role, did you make employment decisions involving others?
  - c. Is there anything about your experience that would prevent you from being a fair and impartial juror to both Ms. Mathews and Santander?
- 11. Ms. Mathew claims that Santander discriminated against her and retaliated against her because she was a female and pregnant.
  - a. Would the subject matter of this case offend you to the point where you would not be able to serve as a fair and impartial juror to both Ms. Mathew and Santander?
  - b. If Ms. Mathew were to fail to meet her evidentiary burden at trial, would the mere allegation of discrimination prevent you from finding in favor of Santander.
- 12. Does anyone have a bad experience with a big company?

- a. Despite that experience, would you be able to serve as a fair and impartial juror to both Ms. Mathew and Santander?
13. Has anyone, or anyone's family members, worked for Santander Consumer USA, Inc., or any other company affiliated with Santander?
- a. If yes: Please give us the details of the employment.
  - b. Is there anything about your or that person's relationship with Santander that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
14. Does anyone own stock in Santander Consumer USA, Inc., or any other company affiliated with Santander?
- a. Is there anything about your ownership of Santander stock that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
15. Does anyone use Santander Consumer USA, Inc., or any other company affiliated with Santander for their personal or business banking?
- a. Is there anything about your relationship with Santander that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
16. Does anyone here personally know, or have any relationship (past or present) with Ms. Mathew or a family member of Ms. Mathew?
- a. Who do you know and what is your relationship with them?
  - b. Is there anything about your relationship with that person that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?

17. Does anyone here personally know, or have any relationship (past or present) with any of the lawyers in this case? The lawyers are: Monte K. Hurst and Clayton S. Carter of Hallett & Perrin; Donald E. Uloth of the Law Office of Donald E. Uloth.
  - a. Which lawyer do you know and what is your relationship with them?
  - b. Is there anything about your relationship with that lawyer that would prevent you from being a fair and impartial juror to both Ms. Mathew and Santander?
18. Do any of you have any feelings toward employers or supervisors that might affect your ability to be a fair and impartial juror in this case?
19. The Plaintiff in this case is an individual and the Defendant is a business corporation.
  - a. Would any of you find it easier to find in favor of an individual than a business or corporation?
20. If Ms. Mathew fails to meet her burden and the law and evidence show that Santander should prevail in this case, would any of you hesitate even for a moment to find in favor of Santander.
21. Has anyone had any other personal experience that may interfere with your ability to be a fair and impartial juror in this case?
  - a. What was the experience?
  - b. How might it interfere with your ability to be fair and impartial?

Respectfully submitted,

**HALLETT & PERRIN, P.C.**  
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*Counsel for Defendant, Santander Consumer USA Inc.*

**CERTIFICATE OF SERVICE**

On December 6, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served Plaintiff's counsel as follows electronically or by another manner authorized by Rule 5(b)(2) of the Federal Rules of Civil Procedure:

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